

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re :

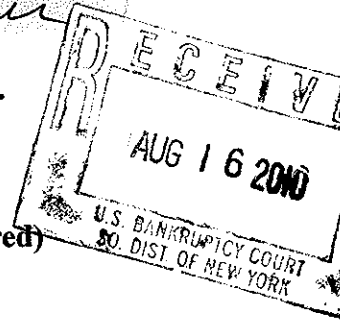
:
LEHMAN BROTHERS HOLDINGS INC., et al., :

:
Debtors. :
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Substantive
Original
Attorney
Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)



Objection of William Kuntz, III to Sun/Moon- Marseille, France Proposal

Now comes William Kuntz, III who appears here Pro Se and respectfully submits¹ the following objection:

- 1) Nothing in the Motion explains how the Property in France fell into disrepair.
- 2) There is no cash flow projection or liquidation study, that might allow the Debtor to consider abandonment rather than an additional \$200,000,000 USD Investment.
- 3) There is nothing in the way of any kind of economic forecast about the going forward prospects for this area of France.

See Disappointing European growth in Q1

http://www.insee.fr/en/themes/theme.asp?theme=17&sous_theme=3&page=vueensemble.htm

Les principaux indicateurs régionaux et départementaux

Tableau de bord regroupant les derniers indicateurs chiffrés disponibles pour la région et les départements. Les publications associées sont en lien

¹ 1 day extra allowed by consent from Attorney Perez by phone @ 10:57 AM

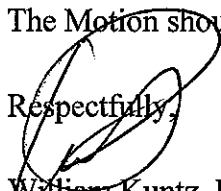
- 4) The Proposed Structure only complicates rather than simplifies ownership.

While the Court has seen favor in 'Warehousing' empty Buildings like the Property in Stamford, Conn redevelopment, 7 time zones away is an all together different matter.

In order to Develop a better understanding of what is involved, this Party Suggests that the Court conduct a 'field trip' by adjourning the Court to the Location of the Property before allowing the Debtor to put 1/5th of a Billion \$US Dollars at risk. The Cost of Airfare for the Court and Staff would be nominal in light of the Proposed Investment as Attached Ex 1.

The Motion should be denied.

Respectfully,


William Kuntz, III
India St PO Box 1801
Nantucket Island, Ma 02554-1801

July 12, 2010
Westport, NY

508-775-5225



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Your departure flight : New York - Marseille

☐ Tuesday, September 7, 2010
AF007 - Voyageur

7:05 PM New York, John F Kennedy (JFK) NY - United States of America -
TERMINAL 1
8:35 AM Paris, Charles de Gaulle (CDG) - France - TERMINAL 2E
+1 Day

Operated by : Air France
Class : T

Aircraft : Airbus A380-800
duration : 07h30mn non stop

Inflight meal served : Meal Breakfast
Baggage allowance : 1 authorized item of bag

☐ Wednesday, September 8, 2010
AF7662 - Voyageur

10:25 AM Paris, Charles de Gaulle (CDG) - France - TERMINAL 2F
11:50 AM Marseille, Marseille (MRS) - France - TERMINAL 4

Operated by : Air France
Class : K

Aircraft : Airbus A320
duration : 01h25mn non stop

Inflight meal served : no information available
Baggage allowance : 1 authorized item of bag

Your return flight : Marseille - New York

☐ Sunday, September 12, 2010
AF6015 - Voyageur

9:00 AM Marseille, Marseille (MRS) - France - TERMINAL 4
10:20 AM Paris, Orly (ORY) - France - TERMINAL W

Operated by : Air France
Class : L

Aircraft : Airbus A319
duration : 01h20mn non stop

Inflight meal served : Snack
Baggage allowance : 1 authorized item of bag

☐ Sunday, September 12, 2010
AF006 - Voyageur

1:35 PM Paris, Charles de Gaulle (CDG) - France - TERMINAL 2E
3:45 PM New York, John F Kennedy (JFK) NY - United States of America -
TERMINAL 1

Operated by : Air France
Class : Q

Aircraft : Airbus A380-800
duration : 08h10mn non stop

Inflight meal served : Meal Snack
Baggage allowance : 1 authorized item of bag

Page 2 of 2

Total due : \$6,855.24

Price	Taxes incl 9/11 fee	Passengers	Tc
\$985	+ \$157.54	x 6 Adults	= !
Total : \$			